

D. GEORGE SWEIGERT, C/O
GENERAL DELIVERY
MOUNTY SHASTA, CALIF 96067

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN

Defendant

Case No.: 2:18-cv-01633-RMG-BM

**PLAINTIFF'S MOTION FOR LEAVE TO
SUPPLEMENT THE PLEADING "PLAINTIFF'S
SHOW CAUSE MOTION FOR INJUNCTIVE
RELIEF" [DOC. NO. 8, FILED 07/09/18]**

MOTION FOR LEAVE

NOW COMES THE PRO SE plaintiff, a layman non-attorney acting pursuant to the private attorney general doctrine to prosecute a public interest lawsuit, to respectfully request this Court for **LEAVE TO SUPPLEMENT THE PLEADING "PLAINTIFF'S SHOW CAUSE MOTION FOR INJUNCTIVE RELIEF"** filed as Doc. No. 8, 07/09/18. This **MOTION FOR LEAVE** is supported by the doctrine of judicial efficiency to relieve further burdens unnecessarily imposed upon the Plaintiff and this Court by Defendant Jason Goodman.

This **MOTION** relies on **FRCP Rule 15(a)(2)** which states in relevant part:

Rule 15. Amended and Supplemental Pleadings

(a) AMENDMENTS BEFORE TRIAL.

(1) *Amending as a Matter of Course.* A party may amend its pleading once as a matter of course within:

(A) 21 days after serving it, or

(B) if the pleading is one to which a responsive pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier.

(2) *Other Amendments.* In all other cases, a party may amend its pleading only with the opposing party's written consent or the court's leave. **The court should freely give leave when justice so requires.**

[emphasis added]

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PLAINTIFF'S MOTION FOR LEAVE TO SUPPLEMENT PLEADING

BACKGROUND

Several events have occurred since the Plaintiff filed **PLAINTIFF'S SHOW CAUSE MOTION FOR INJUNCTIVE RELIEF** filed as Doc. No. 8, 07/09/18.

Defendant – operating thru his commercial enterprises – has created another social media hoax site that relies on nearly **twenty-five (25) video files** which are the exclusive property of the Plaintiff. As seen in the accompanying **PLAINTIFF'S SIXTH REQUEST FOR JUDICIAL NOTICE [6RJN]** the Defendant has publically proclaimed the existence of the hoax news channel **"CRAZY_DAVE"** on the social media platform **BITCHUTE.COM**.

The Defendant owns none of the content that he has decided to upload to a BITCHUTE site that he has described as an "evidence repository". The Defendant has not been granted any rights to allow for this public rebroadcast and distribution of the Plaintiff's protected copyrighted works.

AUGMENTATION AND SUPPLEMENTAL INFORMATION

This pleading alerts the Court as to the continuing and on-going nature of the Defendant's non-stop infringements inflicted upon the Plaintiff's property rights. These property rights include maintenance of copyright right integrity and in the maintenance of a professional reputation.

The Defendant continues unabated to trample on these rights in his continued reckless disregard for the truth and continues to claim in public forums that the undersigned is a leader of some kind of covert group dedicated to making the Defendant appear foolish. Clearly, the Defendant needs no help to accomplish this easily achievable goal.

PRAYER FOR RELIEF

Based on the forgoing the Plaintiff seeks this Court's **LEAVE** to have the Defendant deemed by this Court to have violated the Plaintiff's property rights requiring **INJUNCTIVE RELIEF** to restrain the Defendant's activities.

Dated this day of August 24, 2018


D. GEORGE SWEIGERT